

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

IN RE PORK ANTITRUST  
LITIGATION

Case No. 0:18-cv-01776-JRT-HB

This Document Relates To:

ALL COMMERCIAL AND  
INSTITUTIONAL INDIRECT  
PURCHASER PLAINTIFF ACTIONS

---

**COMMERCIAL AND INSTITUTIONAL INDIRECT PURCHASER  
PLAINTIFFS' MOTION FOR LEAVE TO FILE FOURTH AMENDED AND  
CONSOLIDATED CLASS ACTION COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2) and Local Rule 15.1, Commercial and Institutional Indirect Purchaser Plaintiffs ("CIIPPs") hereby move the Court for an order granting CIIPPs leave to file their proposed Fourth Amended and Consolidated Class Action Complaint.

Dated: June 1, 2021

Respectfully submitted,

By: /s/ Blaine Finley

Jonathan W. Cuneo (*pro hac vice*)

Blaine Finley (*pro hac vice*)

Yifei (Evelyn) Li (*pro hac vice*)

**CUNEO GILBERT & LADUCA, LLP**

4725 Wisconsin Ave. NW, Suite 200

Washington, DC 20016

(202) 789-3960 Telephone

jorc@cuneolaw.com

bfinley@cuneolaw.com

evelyn@cuneolaw.com

Shawn M. Raiter (MN# 240424)

**LARSON • KING, LLP**

2800 Wells Fargo Place

30 East Seventh Street

St. Paul, MN 55101

(651) 312-6518 Telephone

sraiter@larsonking.com

***Interim Co-Lead Counsel for Commercial and  
Institutional Indirect Purchaser Plaintiffs***

Don Barrett (*pro hac vice*)

David McMullan (*pro hac vice*)

Sterling Starns (*pro hac vice*)

**BARRETT LAW GROUP, P.A.**

P.O. Box 927

404 Court Square

Lexington, MS 39095

(662) 834-2488 Telephone

dbarrett@barrettlawgroup.com

dmcmullan@barrettlawgroup.com

sstarns@barrettlawgroup.com

Jon Tostrud  
Anthony Carter (*pro hac vice*)  
**TOSTRUD LAW GROUP, PC**  
1925 Century Park East  
Suite 2100  
Los Angeles, CA 90067  
jtostrud@tostrudlaw.com  
acarter@tostrudlaw.com

J. Gordon Rudd, Jr., (MN# 222082)  
David M. Cialkowski, (MN# 0306526)  
**ZIMMERMAN REED LLP**  
1100 IDS Center  
80 South 8th Street  
Minneapolis, MN 55402  
T: 612.341.0400  
gordon.rudd@zimmreed.com  
david.cialkowski@zimmreed.com  
behdad.sadeghi@zimmreed.com

Marcus Bozeman (*pro hac vice*)  
**BOZEMAN LAW FIRM, P.A.**  
400 West Capitol, Suite 1700  
Little Rock, Arkansas 72201  
<https://www.bozemanfirm.com>  
T: (501) 492-3441  
mbozeman@bozemanfirm.com

*Interim Plaintiffs' Steering Committee for  
Commercial and Institutional Indirect  
Purchaser Plaintiffs*